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4 October 2023

Chief Grace George and Councilors Rick Bailey, David Kenworthy, and Lisa Adams
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Katzie First Nation Letter dated 16 February 2023
Trans Mountain Expansion Project Activities in Katzie First Nation Territory

Before: K. Penney, Presiding Commissioner; W. Jackknife, Commissioner;
S. Sajnovics, Commissioner

Dear Chief Grace George and Councillors Rick Bailey, David Kenworthy, and Lisa Adams:

Thank you for your letter (**Letter**) dated 16 February 2023 ([C23645](#)) addressed to the Minister of Energy and Natural Resources Canada, the British Columbia (**BC**) Minister of Environment and Climate Change Strategy, and the BC Minister of Forests. The Chief Executive Officer of the Canada Energy Regulator (**CER**) and the CER representative on the Indigenous Advisory and Monitoring Committee (**IAMC**) for the Trans Mountain Expansion Project (**Project**) were copied on the Letter. The Letter puts forward Katzie First Nation's concerns and requests regarding how the Trans Mountain Expansion Project (**Project**) is moving forward in Katzie Traditional Territory. The Letter states:

Trans Mountain Canada's [**Trans Mountain's**] current and proposed [Project] construction activities pose significant risks to two significant Katzie sacred and cultural sites¹. Both [Trans Mountain] and the regulators' failure to work with our Nation to monitor and avoid impacts to these areas is a breach of Katzie's laws, Katzie's responsibilities to its membership, the Crown's ongoing consultation and accommodation obligations, and the provincial and federal Project conditions.

In summary, the concerns and associated requests put forward by Katzie First Nation in the Letter, particularly as they pertain to the CER's oversight role, are as follows:

- Trans Mountain has failed to adequately notify and engage with Katzie First Nation regarding Project-related work in Katzie Traditional Territory, particularly at the sacred sites of ɔ́áɔ́cɔ́xɔ́m (Yorkson Creek) and cɔ́w'i't (Port Hammond), which is contrary to BC Environmental Assessment Office (**EAO**) Condition 27² and
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¹ The sites of ɔ́áɔ́cɔ́xɔ́m (Yorkson Creek) and cɔ́w'i't (Port Hammond).

² Of BC Environmental Assessment Certificate E17-01.

Certificate of Public Convenience and Necessity OC-065 (**Certificate OC-065**)
Condition 97, requiring Trans Mountain to consult with affected Indigenous Nations
on management and mitigation of impacts to archaeological/heritage and Traditional
Land Use sites or resources.

- Trans Mountain has prevented Katzie First Nation from being able to properly monitor Project-related activities within Katzie Traditional Territory, which is contrary to BC EAO Condition 12 and Certificate OC-065 Condition 98, which require Trans Mountain to support Indigenous monitoring of Project construction and post-construction activities.
- The regulators (including the CER) have failed to hold Trans Mountain accountable for the non-compliances with these Project conditions, which were specifically put in place to minimize adverse Project-related impacts to Katzie First Nation's inherent and protected rights.
- During the 9 March 2022 CER Field Inspection ([CV2122-106](#)) at the Yorkson Creek site, in which a Katzie First Nation member accompanied CER Inspection Officers as an IAMC Indigenous Monitor, it was observed that archaeological impact assessment work was underway at the site despite Katzie First Nation not receiving any notification regarding this work. In response, Katzie First Nation submitted a CER-IAMC Issues Identification Form³ (**Issues Form**) to the CER on 23 March 2022, leading to a discussion forum held on 8 December 2022 for Katzie First Nation, Trans Mountain, the CER, and the IAMC to seek resolution of the matters identified in the Issues Form. This discussion forum failed to resolve Katzie First Nation's requests noted in the Issues Form, including the request to investigate whether Trans Mountain complied with Certificate OC-065 Conditions 98, 100, and other conditions⁴ when undertaking archaeological impact assessments at the Yorkson Creek site without notice or reasonable opportunity for Katzie First Nation participation.
- Port Hammond is the Katzie First Nation historic home village site and includes the sacred burial site at what is now known as Hammond Mill, a former lumber mill that closed in 2019. Katzie First Nation received notification on 26 January 2023 that Trans Mountain intended to use the Hammond Mill site as a temporary infrastructure site (**TIS**) for a laydown yard to support Project construction, commencing in February 2023. This proposed TIS is not compatible with Katzie First Nation's ongoing efforts to establish a remediation plan for the Hammond Mill site and is not appropriate given that the site is a sacred burial ground. Further, Katzie First Nation's three main reserves are in direct proximity to the proposed TIS. Notification at the end of January that the Hammond Mill site would be affected in February is not appropriate, and under no circumstance should this site be subjected to physical works or activities.

The Letter concludes with Katzie First Nation requesting that all Trans Mountain work in Katzie Traditional Territory, and specifically in and around čáǰcəǰəm (Yorkson Creek) and cx^{wi}t (Port Hammond) cease until:

1. Katzie First Nation has a reasonable opportunity to review details of all work proposed in Katzie Traditional Territory, to provide feedback, and to see that the feedback has been incorporated into revised plans;

³ A communication and tracking tool co-developed by the IAMC and CER for issues identified in the field that may need additional resolution assistance, outside of a specific compliance verification activity.

⁴ E.g., environmental protection of heritage resources is addressed in Condition 72.

2. the regulators (including the CER) confirm that issues of non-compliance will be met with actions that compel Trans Mountain to become compliant; and
3. Trans Mountain ensures that Katzie First Nation monitors can be present for work conducted at all work sites in Katzie Traditional Territory.

On 24 March 2023, the Commission of the CER issued Information Request (**IR**) No. 140 to Trans Mountain, seeking its response to the concerns and requests stated in the Letter, particularly as they relate to Certificate OC-065 Conditions 72, 97, 98, and 100, and Trans Mountain's engagement with the Katzie First Nation in relation to Project construction within Katzie Traditional Territory ([C23794](#)). On 31 March 2023, Trans Mountain filed its response to IR No. 140 ([C23879](#)).

In its response to IR No. 140, Trans Mountain stated and provided information intended to demonstrate that it has:

- engaged with Katzie First Nation during early planning and application development, and through the various phases of pre-construction and construction activities in Katzie Traditional Territory, including opportunities to participate in archaeological field work and in the Project Indigenous Monitoring Program;
- met its regulatory requirements for providing Katzie First Nation with sufficient notice of commencement of Project pre-construction and construction activities in Katzie Traditional Territory;
- met the requirements of the Certificate OC-065 and provincial conditions for the Project;
- engaged with Katzie First Nation specifically regarding potential Project impacts in the Yorkson Creek area since early-2022, that construction methodology has been changed to address Katzie First Nation's concerns, and as a result a significant portion of the surface disturbance along the Project pipeline route in the Yorkson Creek area will be avoided;
- engaged with Katzie First Nation specifically regarding a potential TIS at Hammond Mill to support Project construction; and
- participated in a Field Discussion Process⁵ (the 8 December 2022 discussion forum noted above) during which it addressed questions and subsequently provided a response to its assigned action items.

Decision

Based on an examination of these matters, Trans Mountain's response to IR No. 140, and subsequent Trans Mountain actions and CER regulatory activities undertaken to date as set out below, the Commission will not direct Trans Mountain to cease Project-related work in Katzie Traditional Territory, and specifically in and around čáǵčəǵəm (Yorkson Creek) and cx^wi't (Port Hammond).

⁵ Trans Mountain is a signatory, along with the CER and the IAMC (the Parties), to Terms of Reference for a *TMX-IAMC Monitoring Program: Field Discussion Process*. The Terms of Reference set out an agreed-upon process for discussing issues that arise in the field, so that when issues arise (such as those identified in an Issues Form), the Parties have a path forward to try to reach resolution. The process is not intended to address questions of whether Trans Mountain is in compliance with regulatory requirements, but rather to provide a mechanism to resolve practical issues that arise during construction, as part of the Parties' broader interest in and commitment to continual improvement and excellence.

Commission analysis and findings

The Commission has considered the matters put forward in the Letter that fall under its authority. The Commission approached its analysis of Katzie First Nation's concerns and requests put forward in the Letter based on the following two questions:

1. Do the concerns raised, when considered along with Trans Mountain's response to IR No. 140 and subsequent Trans Mountain actions and CER regulatory activities undertaken to date, demonstrate that Trans Mountain is not in compliance with Certificate OC-065 conditions or the commitments it has made, and if so, is specific Commission action required to address non-compliance?
2. Are there imminent or serious risks of harm to the identified sites of cultural significance that would warrant action by the Commission?

1. Compliance with Certificate OC-065 Conditions or Commitments

The following are the Commission's analysis and findings in response to the issues put forward by Katzie First Nation in its Letter regarding Trans Mountain compliance with Certificate OC-065 conditions (as summarized above).

- a. Trans Mountain has failed to adequately notify and engage with Katzie First Nation regarding Project-related work in Katzie Traditional Territory, particularly at the sacred sites of čáǵčəǵəm (Yorkson Creek) and cx^wi't (Port Hammond), which is contrary to BC EAO Condition 27 and Certificate GC-065 Condition 97, requiring Trans Mountain to consult with affected Indigenous Nations on management and mitigation of impacts to archaeological/heritage and Traditional Land Use sites or resources.*

Trans Mountain filed its updated report in accordance with Condition 97 on 1 September 2017 ([A85811](#)), and the National Energy Board (**NEB**) approved it in Letter Report No. 6 dated 27 September 2017 ([A86331](#)). In its decision, the NEB recognized the Indigenous communities that had submitted Traditional Land Use (TLU) or cultural heritage reports to Trans Mountain for the Project, as well as the Indigenous communities that had conducted additional TLU field reconnaissance. Trans Mountain's Condition 97 report also contained a status update for all potentially affected Indigenous communities and updated information on outstanding issues raised by Indigenous communities since the OH-001-2014 proceeding. This included status updates regarding TLU issues and concerns raised by several Indigenous communities. Trans Mountain's Condition 97 report did not contain any information specific to Katzie First Nation, as no TLU or cultural heritage studies were provided to Trans Mountain by the Katzie First Nation.

As Trans Mountain's Condition 97 filings were approved by the NEB and did not contain any information specific to Katzie First Nation (as no outstanding studies were undertaken), and because Condition 97 does not contain requirements for subsequent updates or ongoing consultation, the Commission finds the evidence does not demonstrate that there are non-compliances with Condition 97.

- b. Trans Mountain has prevented Katzie First Nation from being able to properly monitor Project-related activities within Katzie Traditional Territory, which is contrary to BC EAO Condition 12 and Certificate OC-065 Condition 98, which require Trans Mountain to support Indigenous monitoring of Project construction and post-construction activities.*

Trans Mountain filed its updated plan in accordance with Condition 98 on 27 June 2019 ([C00105](#)), and the NEB accepted the filing in Letter Report No. 3 dated 27 August 2019 ([C01279](#)). Trans Mountain's filing stated that Katzie First Nation was engaged on the plan, but it did not include Katzie First Nation as a community that had reached agreement with Trans Mountain, pursuant to Condition 98(c)⁶. Condition 98 stipulates that participation in monitoring pursuant to the plan is by agreement, i.e., there is no explicit positive obligation on Trans Mountain if agreement cannot be reached. Trans Mountain's plan contains information and feedback received through engagement on the plan pursuant to Condition 98(b). Katzie First Nation is not listed as having provided any feedback on the plan.

In its IR No. 140 response ([C23879-2](#), PDF page 5 of 17), Trans Mountain stated the following:

Trans Mountain has actively engaged with Katzie on several occasions since June 2015 about Katzie participating in a [Project] Indigenous Monitor (IM) role under the program described and approved in Trans Mountain's Condition 98 plan. Trans Mountain has not prevented Katzie from participating in its Condition 98 plan for Indigenous [community] participation in [Project] construction monitoring. Rather, Trans Mountain has offered Katzie an IM role focusing on Katzie [T]raditional [T]erritory and remains open to continuing engagement, so that both parties may arrive at a mutually acceptable agreement of terms.

Since Trans Mountain's Condition 98 submissions were accepted by the NEB and Trans Mountain has demonstrated ongoing efforts to reach an agreement with Katzie First Nation under its Condition 98 monitoring plan, the Commission finds the evidence does not demonstrate that there are potential non-compliances with respect to Condition 98.

- c. During the 9 March 2022 CER Field Inspection ([CV2122-106](#)) at the Yorkson Creek site, in which a Katzie First Nation member accompanied CER Inspection Officers as an IAMC Indigenous Monitor, it was observed that archaeological impact assessment work was underway at the site despite Katzie First Nation not receiving any notification regarding this work. In response, Katzie First Nation submitted a CER-IAMC Issues Form to the CER on 23 March 2022, leading to a discussion forum held on 8 December 2022 for Katzie First Nation, Trans Mountain, the CER, and the IAMC to seek resolution of the matters identified in the Issues Form. This discussion forum failed to resolve Katzie First Nation's requests noted in the Issues Form, including the request to investigate whether Trans Mountain complied with Certificate OC-065 Conditions 98, 100, and other conditions when undertaking archaeological impact assessments at the Yorkson Creek site without notice or reasonable opportunity for Katzie First Nation participation.*

Trans Mountain filed its updated submission in accordance with Condition 100 on 4 July 2019 ([C00292](#)), which was accepted by the NEB in Letter Report No. 3 dated 27 August 2019 ([C01279](#)). Trans Mountain's filing confirmed that it had received necessary provincial authorizations, that it had consulted with the BC Ministry of Forests, Lands and Natural Resource Operations (which approved the mitigation for identified heritage resources

⁶ Condition 98(b) requires that the plan include a description and justification for how Trans Mountain has incorporated the results of its engagements, including any recommendations, into the plan. Condition 98(c) requires that the plan include a list of potentially affected Indigenous communities, if any, that have reached agreement with Trans Mountain to participate in Project construction monitoring activities.

and sacred and cultural sites), and that it had provided a list of sacred and cultural site information identified in the OH-001-2014 proceeding, the MH-052-2018 Reconsideration proceeding, or the Phase III Crown consultations and not already captured under Condition 97. Trans Mountain's Condition 100 submissions listed all Indigenous communities that provided information and all sites identified. Katzie First Nation was not listed as providing any information, and the submissions contained no sites identified by Katzie First Nation. Further, Trans Mountain confirmed that it would update the relevant Environmental Protection Plans for the Project to include any new information from the sacred and cultural sites listed and the mitigation measures referred to in its submissions.

The Commission finds the evidence does not demonstrate that there are potential non-compliances with respect to Condition 100. Trans Mountain's Condition 100 filings confirmed that it had received necessary provincial authorizations, had consulted with the BC Ministry of Forests, Lands and Natural Resource Operations (which approved the mitigation for identified sites), and that Katzie First Nation was not identified as having provided any information on sacred sites for the filings.

Trans Mountain stated in its IR No. 140 response that the archaeological impact assessment (**AIA**) work encountered in the Yorkson Creek area during the 9 March 2022 CER Field Inspection was carried out under BC *Heritage Conservation Act* (**HCA**) Inspection Permit 2015-0258. Trans Mountain stated that this AIA work was conducted in 2021 and 2022 and that the results were provided to Katzie First Nation on 28 April 2022 in Interim Report 2021-25 and on 8 July 2022 in Interim Report 2022-13. These interim reports detailed the discovery and investigations of two newly identified archaeological sites, both of which Trans Mountain stated would be avoided by Project construction activity. Trans Mountain stated that Katzie First Nation has consistently received interim reports for archaeological work conducted in Katzie Traditional Territory under BC HCA Inspection Permit 2015-0258 and that it did not receive any comments on the AIA reports from Katzie First Nation.

The Commission is of the view that the discovery and investigations of the two identified archaeological sites in the Yorkson Creek area were the result of archaeological field work required under BC HCA Inspection Permit 2015-0258, and not due to Project construction activities. The Province of BC maintains responsibility and jurisdiction with respect to archaeological resources and ensuring compliance with Condition 27 of BC Environmental Assessment Certificate E17-01, including the requirement to engage with Indigenous communities regarding the management and mitigation of impacts to heritage sites or resources.

d. Trans Mountain's compliance with Other Certificate OC-065 Conditions.

Although not specifically referenced in the Letter, the Commission analyzed the issues identified by Katzie First Nation regarding Trans Mountain's compliance with the following Certificate OC-065 conditions:

- Condition 6 – Commitments tracking table (particularly those commitments that Trans Mountain made to Katzie First Nation);
- Condition 43 – Watercourse crossing inventory; and
- Condition 72 – Pipeline Environmental Protection Plan (particularly as it pertains to environmental protection of heritage resources).

The Commission finds no evidence of non-compliance with these Certificate OC-065 conditions within the areas of concern identified in the Letter.

2. Imminent or Serious Threat of Harm to the Identified Sites of Cultural Significance that would Warrant Commission Action

- e. *Trans Mountain's current and proposed Project construction activities pose significant risks to two significant Katzie First Nation sacred and cultural sites: cáxćəxəm (Yorkson Creek) and cx'í't (Port Hammond). Both Trans Mountain and the regulators' failure to work with Katzie First Nation to monitor and avoid impacts to these areas is a breach of Katzie First Nation's laws, Katzie First Nation's responsibilities to its membership, the Crown's ongoing consultation and accommodation obligations, and the provincial and federal Project conditions.*

The Commission has examined Trans Mountain's Project construction approaches with respect to these two sites, subject to CER regulatory oversight, to determine the possibility of imminent or serious threat of harm to them, as follows:

Construction Methodology Changes to Mitigate Impacts at the Yorkson Creek Site

Trans Mountain stated in its response to IR No. 140 that it changed Project pipeline construction methodology from open trenched to trenchless construction across the East and West Munday Creek area (also known as the Yorkson Creek area) to mitigate potential impacts that concerned Katzie First Nation regarding this culturally significant area. Trans Mountain included these changes in its 29 October 2021 Condition 43 Watercourse Crossing Inventory Update ([C15795](#)), which was accepted by the Commission on 13 January 2022 in Letter Report No. 109 ([C17190](#)). As a result of these changes, Trans Mountain stated that the archaeological sites in the Yorkson Creek area, as identified by Katzie First Nation, will be avoided by Project construction activity. The Commission finds this consistent with the change to a trenchless crossing method, which is generally less impactful to the environment.

The trenchless construction method used for this area was horizontal directional drilling (HDD). On 16 February 2023, Trans Mountain filed with the CER an application pursuant to section 211 of the *Canadian Energy Regulator Act (CER Act)* for a Project pipeline route deviation at "Munday Creek West" between Kilometre Posts 1153.01 and 1154.23 ([C23300](#)) to accommodate a change in construction methodology for this area from a combination of conventional open trench and bore crossings to HDD. The route deviation was needed because the approved route could not accommodate the required HDD construction works. On 2 March 2023, the Commission approved the route deviation in Orders AO-004-OPL-001-2021 and AO-001-OPL-004-2021, and Permit P-002-2023 ([C23498](#)). In the above Orders, the Commission noted Trans Mountain's continuing obligation to implement their committed-to mitigation plans (e.g., Aquatic Inadvertent Fluid Release Plans, Inadvertent Fluid Release Clean-up Plans, HDD Execution Plans, etc.) and measures outlined in its EPPs, for all aspects of the Project.

In its response to IR No. 140, Trans Mountain provided a comprehensive summary of notifications to, and engagement with, Katzie First Nation since early-2022 regarding Project construction in the Yorkson Creek area, including specific follow-up regarding the concerns associated with identification of AIA work occurring in the area during the 9 March 2022 CER Field Inspection and the chance-find discovery of two archaeological sites within the Yorkson Creek watershed area. As noted previously, these chance finds were identified as a result of the AIA work required under BC HCA Inspection Permit 2015-0258 and were not the result of Project construction activities. This AIA work is outside CER authority, as the Province of BC maintains responsibility and jurisdiction with respect to archaeological resources.

Trans Mountain also provided in its IR No. 140 response an overview of information sharing and engagement with Katzie First Nation regarding their concerns and requests associated with the monitoring, mitigation, and reclamation of potential impacts caused by Project construction activity in the Yorkson Creek area, including Trans Mountain's CER Act section 211 Project pipeline route deviation application (and subsequent Commission approval) to accommodate a change in construction methodology. Trans Mountain also summarized its further efforts to discuss the opportunity for Katzie First Nation to participate in an IM role pursuant to its Condition 98 plan for Indigenous community participation in Project construction monitoring.

Avoidance of the Hammond Mill Site as a TIS

In the Letter, Katzie First Nation put forward concerns regarding Trans Mountain's intended use of the Hammond Mill site as a TIS for a laydown yard to support Project construction. On 16 May 2023, Trans Mountain filed with the CER a submission for a TIS at a different location, identified as the Port Kells Laydown Yard, located on an existing commercial/industrial property within the Port Kells Industrial District in Surrey, BC. In its submission, Trans Mountain stated the following ([C24518-1](#), PDF page 4 of 4):

The site is located approximately 2.8 [kilometres] from the Katzie 2 Reserve, therefore Trans Mountain provided the Katzie First Nation (Katzie) advance notice of the potential use of this site as a temporary laydown yard on April 25, 2023. The purpose of the engagement was to inform Katzie of the planned use of the site, to communicate Trans Mountain's intention to make the appropriate filing with the CER by May 16, 2023, and to obtain feedback from Katzie First Nation prior to the submission to the CER. On May 9, 2023, Katzie replied to the notice requesting information regarding the use of this site and its effect on Trans Mountain's potential use of another site (Hammond Mill) for a similar purpose. On May 10, 2023 Trans Mountain replied that, subject to the CER's acceptance of this Condition 61/73/78 filing, Trans Mountain does not intend to use the Hammond Mill site as a laydown yard. To date, Katzie First Nation has not expressed concerns with Trans Mountain's use of the Port Kells yard.

The Commission accepted Trans Mountain's submission for the Port Kells Laydown Yard TIS in Letter Report No. 232 dated 21 July 2023 ([C25613](#)).

The Commission has analyzed the approaches taken by Trans Mountain to engage with Katzie First Nation and modify its construction methodologies, subject to CER regulatory oversight, to avoid or mitigate impacts to the sacred sites of cáłćăăxəm (Yorkson Creek) and cx^wi't (Port Hammond). Based on the information assessed, the Commission finds no imminent or serious threat of harm to these sites that would warrant action requiring Trans Mountain to cease Project work in Katzie Traditional Territory at this time.

Conclusion

The Commission appreciates Katzie First Nation bringing these matters to its attention. Although Project construction activity is nearing completion in the Yorkson Creek area, the Commission recognizes that construction continues elsewhere in Katzie Traditional Territory and that operation of the Project will continue for many years following construction. The CER will continue to hold Trans Mountain to account for complying with all CER regulatory requirements, including Certificate OC-065 conditions, across the full lifecycle of the Project through the planning and execution of compliance verification activities such as field

inspections and meetings. Where non-compliances are identified, the CER will take immediate action to ensure that Trans Mountain undertakes the necessary corrective actions and brings itself back into compliance.

The Commission expects companies to establish and maintain strong relationships with the Indigenous communities affected by their projects. To this end, the Commission encourages Trans Mountain and Katzie First Nation to work together to promote timely and effective information exchange and dispute resolution regarding Project activities in Katzie Traditional Territory. If this is not possible, the CER's Alternative Dispute Resolution (**ADR**) services are available to assist with resolving a dispute. Participating in ADR is entirely voluntary and requires the consent of the other party. If both parties wish to address some or all their outstanding disputes through the ADR process, either party can make a request for the CER's ADR assistance. For more information about the CER's ADR services, please refer to the [ADR website](#) or contact CER staff at ADR-MRD@cer-rec.gc.ca.

Further, if members of Katzie First Nation encounter an issue or concern regarding the Project (such as an adverse impact or damage) that Katzie First Nation and Trans Mountain have been unable to resolve by other means, either party can submit a complaint to the CER using a Complaint Form that can be downloaded from the CER's [Complaint Resolution website](#). Follow the instructions on the form about how to complete and submit it to the CER. Please note that the CER can only address issues or concerns within its mandate.

Yours sincerely,

Signed by

Ramona Sladic
Secretary of the Commission

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